

January 17, 2007

Ms. Marlene R. Daughtrey
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Streeet NW
Washington, DC 20463

Dear Ms. Daughtrey:

TENN Political Action Committee (FEC ID# C00388421) is in receipt of your Request for Additional Information dated December 15, 2006.

The contribution on 8/21/06 from Kevin Clayton was presumptively redesignated to his spouse, Michelle Clayton, in accordance with 11 CFR 110.1(k)(3)(ii)(B). The check was drawn on a joint account imprinted with the names of both Kevin Clayton and Michelle Clayton, and a letter was sent immediately (and well within sixty days) that notified the donors of the reattribution, and explained their right to request a refund instead.

However, this presumptive reattribution information was inadvertently not included with our October quarterly filing, and we are amending this report to reflect the reattribution.

The contributions made by the Committee to the Ed Bryant for US Senate and to the Hilleary for Senate campaigns were primary 2006 debt retirement donations. These disbursements were made on August 5, 2006, following the Tennessee primary on August 3, 2006, and the next FEC report for these campaigns of course covered activity all the way through September 30. The Committee confirmed with each campaign at the time the contributions were made that each campaign had net primary debt at that time, and reconfirmed this fact with each campaign in the past few days. Therefore, these donations are permissible.

Sincerely:

Keith A. Davis
Treasurer
TENN Political Action Committee (TENN PAC)
